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Fighting for Employee Justice



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January 10, 2025

**VIA ECF**

Hon. Arun Subramanian  
United States District Court Judge  
Southern District of New York  
United States Courthouse  
500 Pearl Street, Room 15A  
New York, N.Y.  
10007-1312

**Re: Robles v. Two Buds Enterprise, Inc. d/b/a Two Buds Dispensary  
Case No. 1:24-cv-7586 (AS)  
Letter Request Adjournment of IPTC**

Dear Judge Subramanian:

We represent Plaintiff Primitivo Robles in the above-referenced matter brought under the Americans with Disabilities Act. We write to respectfully request that the Initial Pretrial Conference currently scheduled for January 16, 2025, be adjourned to allow Plaintiff to initiate default judgment proceedings due to Defendant's failure to appear or otherwise respond to the Complaint.

Plaintiff initiated this action by filing a Complaint on October 7, 2024 (ECF No. 1). An affirmation of service was filed on October 28, 2024 (ECF No. 5). Defendant was required to answer or otherwise respond to the Complaint on or before November 12, 2024 (ECF No. 5). Regrettably, due to unforeseen staffing issues in our office, we did not expeditiously address Defendant's failure to appear, respond, or otherwise engage in this matter.

Our office experienced significant disruptions following the departure of key personnel, including our lead counsel for the ADA Division and a senior paralegal, both of whom were integral to the management and prosecution of our cases. Their simultaneous departure left us

without critical resources, resulting in delays in our ability to effectively prosecute this case. Upon discovering the oversight caused by these staffing issues, we took immediate steps to rectify the situation. We have now fully resolved these staffing issues and have re-established a stable and effective workflow. Specifically, we will initiate the process to file the motion for Default Judgment against the Defendant on or before January 16, 2025.

Additionally, we assure the Court that the Defendant has not been prejudiced by this delay. The Defendant has not yet answered or otherwise responded to the Complaint, and no substantive proceedings have occurred that would be adversely affected by this postponement. The brief delay has allowed us to ensure that all necessary preparations are in place to proceed without further interruption.

Given the significant effort we have invested to overcome these challenges, we respectfully request that the Court not dismiss this case. We are fully committed to proceeding with the prosecution of this matter and ensuring that all future deadlines are met.

Thank you for your understanding and consideration.

Respectfully submitted,

**JOSEPH & NORINSBERG, LLC**

/s/ Arjeta Albani,

Arjeta Albani, Esq.

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